Anglican Diocese of PITTSBURGH

SAFE CHURCH POLICY

for the Protection of Children and Vulnerable Adults

Effective June 30, 2025

Table of Contents

Overview of Policy **6**

A. Purpose of the Policy *6*

B. Diocesan Reports Receivers & Diocesan Reports Investigation Committee *6*

C. Responsibility for this Policy *7*

Policy Summary **7**

A. Awareness and Preparation *7*

B. General Behavioral Expectations *7*

C. Reporting Summary *8*

D. Policy Statement *8*

E. Definitions *9*

Screening **13**

A. Background Checks *14*

B. Membership *16*

C. Employment/Volunteer Application *16*

D. Prior Sexual Offenders *17*

Safe Church Training **17**

A. Abuse Awareness Training *18*

B. Safe Church Policy for the Protection of Children and Vulnerable Adults Training *19*

C. Camp Leadership Training *19*

Safety Guidelines **19**

A. Communications *19*

B. Physical Interactions *20*

C. Discussion of Human Sexuality *21*

D. Nudity or Undressing *21*

E. Addictive Substances *21*

F. Technology and Social Media *22*

G. Spiritual Formation, Direction, or Discipleship with Children or Vulnerable Adults *22*

Events with Children, Youth, or Vulnerable Adults **23**

A. Supervisory Plan *23*

B. Monitoring Procedures *24*

C. Restroom Use *24*

D. First Aid and Medication *25*

E. Release of Children or Vulnerable Adults *26*

F. Transportation *26*

G. Overnight Events *27*

H. Off-Campus, Non-Sponsored Youth Activities and Events *28*

I. On-Campus, Non-Sponsored Activities and Events *28*

J. Home Group Procedures *29*

Reporting **29**

A. Examples of Misconduct to be Reported *29*

B. Receiving a Complaint from an Adult *30*

C. Receiving a Complaint from a Child or Vulnerable Adult *31*

D. Initial Report to Diocesan Reports Receiver *32*

E. Mandated Reporting *33*

F. Allegations Against Lay Leaders *33*

G. Allegations Against Clergy *34*

H. Allegations Against the Bishop *34*

Complaint Response Process **34**

Responses **36**

A. Initial Responses *36*

B. Administrative Leave *37*

C. Investigative Response *37*

D. Further Investigative Response for Clergy *38*

E. Documentation *38*

F. Release of Information *39*

G. Disciplinary Action *39*

Policy Creation and Maintenance 40

A. Division of Responsibilities *40*

B. Basic Procedures *40*

Policy Oversight 40

A. The Diocesan Office *40*

B. Clergy Responsibilities *40*

C. Rectors and Wardens *41*

D. Employees, Vestry Members, Child and Youth Workers, and Workers with Vulnerable Adults *41*

E. Insurance Concerns *41*

Compliance 42

A. Congregations *42*

B. The Diocese *42*

Anglican
Diocese of
PITTSBURGH

907 Middle St
Pittsburgh, PA 15212
412.281.6131
adpgh.org

THE OFFICE OF THE BISHOP

March 20, 2025

The church of Jesus Christ should be a place of love, care, and safety for all its members, especially those who are most vulnerable to harm. Tragically, however, we know that in many Christian institutions, including our own denomination, that has not always been the case. ACNA Canon I.5.8 states that, "it is the moral duty of the whole Church (the Province, the dioceses, and local congregations and ministries) to see that the flock of Christ is protected from abuse." While it is the duty of the whole church, it falls particularly to bishops, rectors, and vestries, as leaders of the church, to be proactive in taking steps that ensure that protection.

This Safe Church Policy is designed to provide guidance for the design and implementation of each congregation's policies to protect children and vulnerable adults. As these matters evolve, we will make every effort to review and revise the Policy to ensure our practices remain current.

We see the guidelines contained in this Policy as the guardrails for our congregations in preventing the incidence of abuse or misconduct. As guardrails are only helpful when they are erected in the proper places and kept in good repair, so too must we not only adopt this Policy, but train ourselves and those who serve our churches to maintain and adhere to it.

It is my hope that, as we adopt this Policy and its practices, our congregations will continue to be places of safety and security where everyone can grow in faith and maturity as Christian disciples.

Grace and peace to you,

+Alex W. Cameron

The Right Reverend Alex W. Cameron
Bishop of the Anglican Diocese of Pittsburgh

Overview of Policy

A. Purpose of the Policy

This Safe Church Policy for the Protection of Children and Vulnerable Adults (the "Policy") provides guidance, information, instruction, and common practices to direct and inform the clergy and laity of the Anglican Diocese of Pittsburgh (the "Diocese") as they create or update the child and vulnerable adult protection policies for their own congregations. It also serves as a reference manual to inform decisions and methods with regard to safeguarding the children and vulnerable adults entrusted to the church, providing standards of care and vigilance.

The requirements outlined in this Policy must be followed by each congregation. If an individual congregation's optional addendum to this Policy includes additional, reasonable safety measures, all clergy, employees, Child and Youth Workers, and Workers with Vulnerable Adults of that congregation should be held accountable to that addendum as well as this Policy. It is recommended that vestry members also be compliant with such an addendum.

B. Diocesan Reports Receivers & Diocesan Reports Investigation Committee

The Bishop will appoint and cause to be trained at least two Diocesan Reports Receivers and a Diocesan Reports Investigation Committee. These Diocesan Reports Receivers and Diocesan Reports Investigation Committee members may serve jointly with other dioceses in the Province.

The Bishop is responsible for the creation and promulgation of this Policy under the authority and oversight of the Diocesan Council and the Standing Committee in accordance with The Constitution and Canons of the Anglican Diocese of Pittsburgh ("ADP C&C") and The Anglican Church in North America Constitution and Canons (the "ACNA C&C"), as each may be amended from time to time.

From time to time, ideally at least every two years, it is recommended that the Diocesan Council will review and, if necessary, revise the Policy in light of practical experiences, medical and other scholarly research, legal developments, and other relevant considerations.

C. *Responsibility for this Policy*

While it is the moral duty of the whole church to see that the flock of Christ is protected from abuse, it shall be the duty of the Rector of each congregation, rather than that of the Diocese or the Anglican Church in North America ("ACNA"), to ensure that such processes and procedures are implemented within the congregation, mission fellowship, or church plant that he/she leads, and to monitor and ensure compliance with such processes and procedures, including providing all reports requested by the Diocese.

1. In the absence of a Rector, the priest-in-charge or the Senior Warden will be responsible.
2. Duties may be delegated, except in those areas specifically delineating action by the Rector.

Policy Summary

Every congregation in the Diocese is expected to have in place these procedures (or their equivalent) for preventing misconduct and/or abuse of children and vulnerable adults. Below are key points to remember from this Policy.

A. *Awareness and Preparation*

1. All clergy, employees (of the diocese and each congregation), diocesan leadership, Child and Youth Workers, and Workers with Vulnerable Adults (as defined herein) must be screened, background-checked, and trained on this Policy prior to serving. This is also recommended for vestry members.
2. All clergy, employees (of the diocese and each congregation), diocesan leadership, Child and Youth Workers, and Workers with Vulnerable Adults must complete the sexual abuse prevention training prior to serving. This is also recommended for vestry members.
3. Documentation for laity is maintained by each congregation. Documentation for clergy is maintained by the Diocese.
4. Both the Diocese and its congregations should carry appropriate insurance. Most insurance policies do not cover sexual misconduct or negligent hiring/supervision in sexual abuse situations. Separate "riders" can be purchased, although some require strict preconditions to coverage like screening, awareness, and prevention training.

B. *General Behavioral Expectations*

1. When working with children or vulnerable adults, either at least two Certified Adults or one Certified Adult with two youth should be present at all times.

2. Healthy boundaries must be maintained in pastoral counseling. The Diocese recommends limiting private pastoral counseling sessions to three per person and, if possible, conducting such sessions in a space visible to others (such as behind a glass window).
3. Pastoral counseling sessions should be held in a place where others are present.
4. Verbal interaction should be kind, clean, legal, and age appropriate.
5. Adults should follow all guidance for appropriate behavior with children and vulnerable adults.
6. Whenever a parent or legal guardian (note that all future references in the Policy to parents also include legal guardians) is in the presence of their minor child, full responsibility for that child belongs to the parent, even if clergy, employees (of the diocese and each congregation), and/or a Child and Youth Worker are also present.

C. Reporting Summary

Reporting is described in greater detail beginning at page 26 under "Reporting."

1. Any report of misconduct or abuse against children or vulnerable adults must be reported without delay to one or both of the Diocesan Reports Receivers.
2. All mandated reports must be made to the proper legal authorities without delay, with the assistance or guidance of the Diocesan Reports Receivers.
3. The Diocesan Reports Receivers will report all allegations against clergy to the Bishop.
4. The Diocesan Reports Receivers will report all allegations against a bishop to the Archbishop.
5. The Diocesan Reports Receivers will assist in reporting all allegations against lay persons to senior congregation leadership (Rector or Priest in Charge, Senior Warden, Safe Church Director, if applicable, or other).
6. If someone does not feel comfortable reporting to the Diocesan Reports Receiver, he/she may report directly to the Rector. It is then the responsibility of the Rector to forward the report without delay to one or both Diocesan Reports Receivers.

D. Policy Statement

The Bishop and the Diocese strictly prohibit any and all types of abuse (as defined herein) by any member of the clergy, anyone pursuing ordained ministry, any employee (of the diocese or a congregation), diocesan leader, vestry member, congregation member, visitor, Child and Youth Worker, or Worker with Vulnerable Adults, or anyone else working in any capacity for the Diocese, any congregation in the Diocese, or any diocesan-related institution.

E. Definitions

As used herein, the Diocese defines the following terms as stated hereinbelow:

1. Abuse of Vulnerable/At-Risk Adults: Pennsylvania law protects adults (persons 18 years of age and older) with a physical or mental disability that limits one or more major activities from abuse, neglect, exploitation, or abandonment. It also protects adults 60 years and older from abuse, neglect, abandonment, or financial exploitation.
    a. Physical Abuse: Non–accidental physical injury. Physical abuse may be a single episode or repeated episodes and can range in severity from minor marks and bruising to death. A non–accidental physical injury does not include appropriate medical care, appropriate restraints, or appropriate discipline. Physical abuse can include unreasonable confinement or restraint.
    b. Sexual Abuse: subjection to sexual conduct or contact classified as a crime.
    c. Caretaker Neglect or Abandonment: when adequate food, clothing, shelter, or care necessary for health or safety is not provided in a timely manner and with reasonable care, or when a caretaker knowingly uses harassment, undue influence, or intimidation to create a hostile or fearful environment for the at-risk person. Abandonment is desertion by a caretaker.
    d. Exploitation: an act or omission that improperly deprives an at-risk person of anything of value, profits from the at-risk person to their detriment, misuses their property, or forces, compels, coerces, or entices them to perform services for the advantage of another person.
    e. Financial Abuse: the illegal or improper use of a vulnerable person or his/her financial resources for another's profit or advantage. Some examples of financial abuse may include the following: taking money or property; forging a signature; getting a person to sign a deed, will, or power of attorney through deception; coercion or undue influence; or illegally or improperly adding names to financial accounts or safety deposit boxes. The elderly in particular are often targeted for financial abuse.
2. Advocate: person(s) selected by the Complainant with consent of the Bishop, or appointed by the Bishop if the Complainant desires, to assist the Complainant(s) in understanding and participating in the disciplinary processes of the church, including obtaining assistance to formulate and submit a complaint that conforms to the canons. Advocates are not to serve as legal advisors or pastors.

3. Bullying: a form of aggressive behavior in which one child or adult intentionally and repeatedly causes another child or adult injury or discomfort. Bullying can take the form of physical contact, words, or more subtle actions.
4. Camp Director: if applicable, a Certified Adult overseeing a child or youth camp offered by the Diocese or one of its congregations, whether employee or volunteer.
5. Certified Adult: an adult who has gone through the full screening and training process outlined in this Policy. All clergy (including those seeking ordination or transfer into the Diocese), employees (of the diocese and each congregation), and diocesan leadership are required to be certified. This is also recommended for vestry members. All Child and Youth Workers and Workers with Vulnerable Adults are required to be certified prior to serving.
6. Chaplain: spiritual advisor to the Complainant, or to the respondent, selected by the Complainant or respondent, or appointed by the Bishop if the Complainant or respondent desires.
7. Child or Youth: any unmarried person under the age of majority under state law-who has not been emancipated by order of the court. In most cases, "child" refers to infants through elementary school, and "youth" refers to middle/junior high through high school-aged minors.
8. Child Abuse: any action or lack of action, usually in the context of a relationship of responsibility, trust, or power, that significantly endangers or harms a minor's physical or emotional health and development. Abuse of a child includes acts and/or omissions. Corporal discipline of a child by a parent for disciplinary purposes does not necessarily constitute abuse when it does not result in harm to the child. See PA Cons. Stat. Tit. 23 § 6303 for the full definition of Child Abuse and Neglect.
    a. Child Neglect: "Serious physical neglect" means any of the acts noted below under "Neglect" when committed by a perpetrator that endangers a child's life or health; threatens a child's well-being; causes bodily injury; or impairs a child's health, development, or functioning.
    b. Child-on-Child Sexual Abuse: perpetrated by one or more children against one or more other children. The term "sexual abuse" does not include consensual activities between a child who is aged 14 or older and another person who is aged 14 or older and whose age is within four years of the child's age. Whether abuse or not, child-on-child sexual behavior is harmful to all children involved and must be addressed.
    c. Child Sexual Abuse: "sexual abuse or exploitation" means the employment, use, persuasion, inducement, enticement, or coercion of a child to engage in or assist another individual to engage in sexually explicit conduct including, but not limited to,

the following: looking at the sexual or other intimate parts of a child or another individual for the purpose of arousing or gratifying sexual desire in any individual; participating in sexually explicit conversation either in person, by telephone, by computer or by a computer-aided device for the purpose of sexual stimulation or gratification of any individual; actual or simulated sexual activity or nudity for the purpose of sexual stimulation or gratification of any individual; actual or simulated sexual activity for the purpose of producing visual depictions, including photographing, videotaping, computer depicting, or filming. See Cons. Stat. Tit. 23 §§ 6303; 6304 for the full definition of Child Sexual Abuse.

d. Emotional Abuse: includes causing or substantially contributing to serious mental injury to a child through any act or failure to act or a series of such acts or failures to act. "Serious mental injury" means a psychological condition, as diagnosed by a physician or licensed psychologist, including the refusal of appropriate treatment, that either renders a child chronically and severely anxious, agitated, depressed, socially withdrawn, psychotic, or in reasonable fear that his/her life or safety is threatened, or that seriously interferes with his/her ability to accomplish age-appropriate developmental and social tasks.

e. Neglect: "Serious physical neglect" means any of the following acts when committed by a perpetrator that endangers a child's life or health; threatens a child's well-being; causes bodily injury; or impairs a child's health, development, or functioning. Neglect is a pattern of failing to meet the child's basic needs for food, clothing, shelter, education, health care or other essentials, in the context of resources reasonably available to the child's family or caretakers. Physical neglect may include the failure to provide necessary food, shelter, protection, or supervision. Medical neglect may include the failure to provide necessary medical or mental health treatment. Educational neglect may include the failure to educate a child or attend to his or her special education needs. Emotional neglect may include inattention to a child's emotional needs or psychological care or letting the child use alcohol or drugs.

9. Child and Youth Worker: adult volunteers and paid childcare workers who serve in child and youth activities in diocesan institutions, programs, and congregations. This includes teachers in Sunday school classrooms or discipleship groups. It also includes anyone who has access to children in a supervisory capacity even if he/she is not the primary teacher. All Child and Youth Workers must be Certified Adults. All supervision of minors must include two

Certified Adults, preferably unrelated (the Two-Adult Rule), or one Certified Adult with two youth in every room (the Rule of Three).

10. Children's Ministry Director: if applicable, the person overseeing children's ministry in a congregation, whether employee or volunteer. This may or may not be the same person as the Safe Church Director.
11. Complainant: the person who makes a complaint of abuse under this Policy.
12. Consent: children under the age of 13 cannot give consent to sexual activity, and a minor ages 13-15 cannot consent to sexual activity with someone four or more years older than he/she is. A vulnerable adult cannot consent to sexual activity if he or she is not mentally competent.
13. Diocesan Reports Receiver: an unbiased receiver who is trained to respond to allegations of misconduct/abuse made through a designated diocesan hotline, website, or email address. They are trained to deploy predetermined notification policies, depending upon the written allegation submitted. Per the ACNA Title 1, Canon 5, Section 9, each diocese must appoint at least two Diocesan Reports Receivers to receive reports of misconduct in accordance with this Policy. In no event shall any Chancellor of the Diocese serve as a Diocesan Reports Receiver.
14. Grooming: "Grooming is the process of manipulation by which an offender prepares a child, the adult in the child's life, and the environment for the abuse. The goal of this manipulation is to gain access to the child, gain the child's compliance, and keep the secret. Distinguishing between sexually motivated manipulation and normal adult/child interactions is difficult when people have no knowledge of sex offender dynamics."[1]
15. Inappropriate Behavior: actions that raise concern regarding the treatment of a child or vulnerable adult, but that do not meet the definition of abuse. Inappropriate behavior will trigger an action plan.
16. Mandated Reporter: adults that are required to report suspected abuse if they have reasonable cause to suspect that a child or vulnerable adult is a victim of abuse, including clergy or spiritual leaders of any regularly established congregation and individuals, paid or unpaid, who, as an integral part of a regularly scheduled program, activity, or service, are responsible for the child or vulnerable adult's welfare or have direct contact with children or vulnerable adults. For Pennsylvania, see Title 23 § 6311(a) for a full list of mandated reporters. Other jurisdictions should verify applicable state law.

[1] Children's Advocacy Center of Collin County, Don Powers, "Our Leadership," Children's Advocacy Center of Collin County (blog), 2019, https://www.caccollincounty.org/who-we-are/our-leadership/.

17. Reasonable Suspicion: a belief that a child or vulnerable adult is or is likely to be a victim of abuse based upon specific and articulable facts. Reasonable suspicion is more than a mere "hunch" but needs not be substantiated by evidence. Reasonable suspicion does not imply actual knowledge or certainty. A person has a reasonable suspicion of abuse when a reasonable person who observed the same facts would come to the same conclusion that a child or vulnerable adult is or is likely to be a victim of abuse.
18. Respondent: anyone who is accused of misconduct or abuse.
19. Rule of Three: if a situation arises where only one Certified Adult is present, a minimum of two youth must also be present.
20. Safe Church Committee: if applicable, this group may assist the Safe Church Director in working on the policies, programs, facilities, screening, training, compliance with policies, responses, and investigations. Committee members may be subject to change at the discretion of the Safe Church Director and the Rector, with approval from the vestry.
21. Safe Church Director: employee or volunteer who, at the congregation level, has the responsibility to coordinate policies, programs, facilities, screening, training, compliance with policies, responses, and investigations. Required for all congregations.
22. Sexual Misconduct Against Minors/Vulnerable Adults: sexual misconduct against any person including, but not limited to, any sexual involvement or sexual contact with a person who is a minor or a vulnerable adult where viable consent is not present.
23. Two-Adult Rule: when working with children or youth, two Certified Adults (preferably unrelated) are to be present; a child/youth must not be alone with a single adult.
24. Vulnerable/At-Risk Adult: a person, 18 years of age or over, who may need care or services because of a disability (mental or other), age, or illness. A person may be a vulnerable adult if he/she is unable to look after him/herself, protect him/herself from abuse or exploitation, or unable to report abuse.
25. Worker with Vulnerable Adults: Certified Adults who work with at-risk or vulnerable adults.
26. Youth Director: a person overseeing youth ministry in a congregation, whether employee or volunteer.
27. Youth Volunteer Worker: a worker who is a minor and has gone through the screening and training process as required by state law. A Youth Volunteer Worker may assist an adult Child and Youth Worker.

Screening

One of the foundational steps to providing a safe church environment is careful screening of clergy, employees (of the diocese and each congregation), diocesan leadership, Child and Youth Workers,

and Workers with Vulnerable Adults. Screening is designed to expose any potential concerns prior to participation and includes background checks, reference checks, interviews, and minimum attendance periods. This is also recommended for vestry members.

To help understand who must be screened, by when, and where to keep documentation, see the chart below:

SCREENING

CLERGY (including transfers and postulants)	EMPLOYEES (of the diocese or congregation)	DIOCESAN LEADERSHIP (recommended for vestry members)	CHILD AND YOUTH WORKERS and WORKERS WITH VULNERABLE ADULTS
Background check required prior to ordination/transfer/ hire and every 5 years	Background check required prior to hire and every 5 years	Background check required prior to service	Background check required prior to serving and every 5 years
Application, references, and interview required	Application, references, and interview required	Application, references, and interview NOT required	Application, references, and interview required
Diocese keeps records	Congregation keeps records	Diocese/Congregation keeps records	Congregation keeps records

A. Background Checks

The requirement for background checks includes all clergy, employees (of the diocese and each congregation), diocesan leadership, Child and Youth Workers, and Workers with Vulnerable Adults in diocesan institutions, programs, and congregations. This is recommended for vestry members.

Background checks should be compliant with the Fair Credit Reporting Act (FCRA) and must be completed prior to serving, hire, ordination, or transfer (as applicable) and in compliance with any insurance carrier's requirements.

1. Non-clergy employees (of the diocese and each congregation), diocesan leadership, Child and Youth Workers, and Workers with Vulnerable Adults can complete their required background checks through Ministry Safe using the ACNA negotiated rate, or through an equivalent program. This should include criminal history, sex offender registry check, and, as appropriate, DMV driver's license check (see "Transportation" below). A credit bureau record check is also recommended for clergy, treasurers, bookkeepers, check signers, and those with access to any congregation financial accounts and/or credit cards. This is recommended for vestry members.
2. The screening of clergy is the responsibility of the Bishop, not the ACNA. Clergy seeking canonical residence or license must be background checked through Oxford Document Management (ODM) and must also submit the appropriate state child abuse clearances and complete the appropriate state/FBI fingerprinting prior to the acceptance of Letters Dimissory or issuance of a license. Clergy are responsible for covering the costs of these services and for updating them every five years. It is the responsibility of the congregation to notify the diocesan office to begin a background check as soon as the vestry has decided who it would like to call. A call should not be considered final until the results of the background check are received.
3. Clergy background checks will include:
    a. Inquiries of all bishops having past or present canonical authority over the individual, all schools attended by the individual during the past five years, and employers of the individual during the past five years. If the individual has had more than two employers during the last five (5) years, then inquiries will be made of the two most recent employers. In the case of clergy who have served as Rector, "employer" shall be the Senior Wardens of the congregations served during the past five years.
    b. Motor vehicle record check and credit bureau check.
    c. Sexual misconduct and criminal record check.
    d. Local criminal history records check through local law enforcement agencies.
    e. Statewide criminal history records check through the appropriate state law enforcement agencies.
    f. References from immediate supervisors (or acceptable substitutes) at the most recent places of employment and results documented.
    g. A social media search is recommended.

h. It is the responsibility of all clergy to cooperate fully in all aspects of the screening process and to submit in a timely manner all documents needed to complete such checks.

4. Each member of the clergy canonically resident or licensed in the Diocese will be required to update and pay for their ODM background check on a five-year rotating schedule, to be administered by the Diocese. His/Her congregation may choose to pay this fee.

B. Membership

Any and all vestry members, Child and Youth Workers, and Workers with Vulnerable Adults must complete at least six months of attendance prior to appointment, including active participation in the life of the church and Sunday morning worship. For vestry members, local congregation bylaws may have additional membership requirements.

C. Employment/Volunteer Application

For employees and all volunteers who work with children and vulnerable adults, the host congregation should

1. have the applicant fill out a complete application
    a. whether or not he/she or any immediate family member or person living in his/her household has been convicted of, pled *nolo contendere* to, had adjudication withheld for, or has an active arrest for any crime involving abuse or neglect,
    b. whether or not he/she has been diagnosed with any paraphilic psychological condition, and
    c. whether he/she has ever been accused of abuse or behavioral violations with children or vulnerable adults,
2. conduct criminal history and National Sexual Offender Registry checks,
3. secure references from immediate supervisors (or acceptable substitutes) at the most recent places of employment and results documented,
4. secure at least two personal references,
5. check the applicant's references,
6. conduct a face-to-face interview with detailed questions about interactions with children or vulnerable adults and overall lifestyle, and
7. a social media search is recommended.

It is recommended that congregation leaders familiarize themselves with effective screening practices and how to recognize high-risk applicants. MinistrySafe and Brotherhood Mutual offer training on screening practices.

Disqualifications: Applicants deemed by the congregation, in its discretion, to indicate any threat or danger to children or vulnerable adults will not be permitted to work with children or vulnerable adults. The following conduct or characteristics by an applicant shall automatically disqualify an applicant from working with children: any history of child sexual abuse, any history of violent crime, and any history of sexual crime or misconduct. The following conduct or characteristics by an applicant shall automatically disqualify an applicant from working with vulnerable adults: any history of sexual abuse, any history of violent crime, and any history of sexual crime or misconduct.

D. Prior Sexual Offenders

Go to https://www.adpgh.org/protecting-our-people/ to find our diocesan policy on prior sexual offenders in the church.

Safe Church Training

Clergy, employees (of the diocese and each congregation), diocesan leadership, Child and Youth Workers, and Workers with Vulnerable Adults must be properly trained to care for those they serve in ministry. This training includes job functions and recommended practices outlined in this Policy to ensure the environment is safe for our people. This is also recommended for vestry members.

SAFE CHURCH TRAINING

CLERGY (including transfers and postulants)	EMPLOYEES (of the diocese or congregation)	DIOCESAN LEADERSHIP (recommended for vestry members)	CHILD AND YOUTH WORKERS and WORKERS WITH VULNERABLE ADULTS	CAMP DIRECTORS
Awareness training required prior to ordination/ transfer/hire and every 2 years	Awareness training required prior to hire and every 2 years	Awareness training required prior to serving and every 2 years	Awareness training required prior to serving and every 2 years	Awareness training required prior to start and every 2 years
Policy training required prior to start and every 2 years	Policy training required prior to start and every 2 years	Policy training required prior to start and every 2 years	Policy training required prior to start and every 2 years	Camp training required prior to start and every 2 years
Diocese keeps records	Congregation keeps records	Diocese/Church keeps records	Congregation keeps records	Policy training required prior to start and every 2 years
				Congregation keeps records

A. Abuse Awareness Training

The first portion of the Safe Church training is currently completed through MinistrySafe and will be completed online. This training must be completed prior to ordination, transfer, and/or hire for clergy, prior to hire for employees (of the diocese and each congregation), prior to service for diocesan leadership, and prior to serving as Child and Youth Workers or Workers with Vulnerable Adults, and renewed every two years. This is recommended for vestry members.

B. *Safe Church Policy Training*

The second portion of Safe Church training will be offered in person by your congregation's Safe Church Director. This training covers the content of this Policy and must be renewed every two years. In addition to completing this training, all clergy, employees (of the diocese and each congregation), diocesan leadership, Child and Youth Workers, and Workers with Vulnerable Adults must certify that they have read this Policy. This is recommended for vestry members. All diocesan congregations will submit a compliance form annually with their financial audit.

C. *Camp Leadership Training*

The third portion of Safe Church training is required for Diocesan Camp Directors and congregation Camp Directors (any congregation leader leading overnight events, trips, and/or camps). MinistrySafe's Camp Leadership Training must be completed online prior to service as a camp director and renewed every two years.

In all instances, diocesan congregations will submit a compliance form annually with their financial audit.

Safety Guidelines

A. *Communications*

Verbal interactions between leaders and children or vulnerable adults should be encouraging, constructive, and mindful of the mission of aiding parents in the spiritual growth and development of their children.

1. To this end clergy, employees, and Child and Youth Workers should avoid talking to children or parents in a way that is, or could be, construed by any reasonable observer as harsh, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. In addition, clergy, employees, Child and Youth Workers, and Workers with Vulnerable Adults are expected to refrain from using vulgar language in the presence of children and vulnerable adults. Concerns about children should be directed to parents, the appropriate ministry leader, or the clergy, in addition to reporting to applicable legal authorities.
2. Clergy, employees, Child and Youth Workers, and Workers with Vulnerable Adults should avoid engaging in any sexually oriented communications with children or vulnerable adults, and should refrain from discussing any inappropriate or explicit information about their own personal relationships or dating and sexual activities with any child or vulnerable adult in the program. Clergy, employees, Child and Youth Workers, and Workers with Vulnerable Adults

should report any sexually oriented communications involving a child or vulnerable adult to the appropriate ministry leader or clergy and applicable legal authorities.

B. Physical Interactions

Clergy, employees, Child and Youth Workers, and Workers with Vulnerable Adults often have a powerful relationship of trust with the people to whom they minister. Betrayal of that trust through violation of sexual boundaries causes great emotional and spiritual harm. Such behavior is a denial of our calling as Christians and may be a violation of the law. We must take every step to prevent it and to respond with swift justice if misconduct or abuse should occur.

1. Any physical contact with a child should only be provided for the benefit of the child and must never be based upon the emotional needs of the clergy, employee, Child and Youth Worker, or Worker with Vulnerable Adults.
2. It is the diocesan policy that all Child and Youth Workers and Workers with Vulnerable Adults are prohibited from using physical discipline in any manner for the behavioral management of children or vulnerable adults. This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate behaviors by children or vulnerable adults.
3. If necessary, discipline must be limited to using time outs and other non-physical methods of behavior management.
4. In some circumstances, physical restraint may be used to prevent self-injury by the child or vulnerable adult and/or harm to others or to property.
5. Uncontrollable or unusual behavior should be reported immediately to parents, the Children's Ministry Director, Youth Director, and/or clergy.
6. Any physical contact or physical affection must be given only in observable public or open places. It is much less likely that touch will be inappropriate or misinterpreted when physical contact is open to observation.
7. Do not force physical contact, touch, or affection on a reluctant child or vulnerable adult. A person's preference not to be touched must be respected at all times.
8. Personal behavior should always foster trust and be above reproach.

Here is an example summary table of appropriate and inappropriate physical affection.

PHYSICAL INTERACTIONS

Appropriate physical affection may include:

high fives
handshakes
fist bumps
thumbs up
side hugs
smiling
pats on the back

Inappropriate physical affection may include:

wrestling
tickling
sitting in laps (except nursery-aged children)
kissing in any form
initiating frontal hugs
commenting on children's bodies
forcing unwanted attention

C. Discussion of Human Sexuality

Staff members and/or volunteers may (subject to any limitations that may be imposed by the Rector) use age-appropriate materials when leading discussions with children dealing with human sexuality or sexual abuse prevention. Prior to introducing these discussions, staff and/or volunteers must notify parents, make the materials available for their review, and obtain their permission.

D. Nudity or Undressing

1. Nudity is not permitted in connection with any church-related activities. Child and Youth Workers and Workers with Vulnerable Adults must never be nude in the presence of children in their care.
2. In a situation that may call for undressing (i.e. changing clothes during a pool party, an overnight retreat, etc.), the Children's Ministry Director, Youth Director, or other leader with authority in the situation must detail rotation procedures for both adults and children to shower or change clothes.
3. If necessary, children should be reminded to avoid nudity in the presence of others.

E. Addictive Substances

Certain substances must not be used or possessed by clergy or volunteers while in church facilities, while traveling with or in the presence of children or at-risk adults, during church-sponsored youth activities, or while working with or supervising children or at-risk adults.

1. This includes tobacco products, vaping, or any illegal or mind-altering drugs.
2. Child and Youth Workers and Workers with Vulnerable Adults may not be under the influence of alcohol.
3. They may not share or view pornographic material.

F. Technology and Social Media

Social media avenues are important ways for youth ministry staff and volunteer leaders to connect with people to whom they minister. Their world is often constructed around social media, for better or worse. Having personal interactions in this venue allows adults to model appropriate behavior and may help form valuable connections.

1. The Diocese strongly recommends that each congregation have a proactive policy for social media and other forms of electronic communication in the context of ministry.
2. Clergy, employees, and volunteers shall refrain from connecting with students on social media when students are younger than the minimum age as established by each social media outlet (usually 13).
3. Virtual spaces are to be treated the same as in-person spaces.
4. This means two Certified Adults (preferably unrelated) must be online with one or more youth or vulnerable adult, participants must be appropriately clothed, and conversations must be within "public" view.
5. If a situation arises where only one Certified Adult is present, a minimum of two students or vulnerable adults must also be present.
6. For online conference calls, calls may not be held in the bedroom, and the parents must be aware that the youth or vulnerable adult is in conversation with the leaders.
7. Use group apps rather than private messages. In text and email exchanges with young people or vulnerable adults, Child and Youth Workers must copy parents or another congregation leader (Certified Adult) in any messages they send.
8. When communicating with youth younger than 13 years of age (this is the usual minimum age for social media platforms), get parental permission for any communication and welcome the parents into that environment.

G. Spiritual Formation, Direction, or Discipleship with Children or Vulnerable Adults

If spiritual formation, discipleship, or spiritual direction with a youth or vulnerable adult is entered into long-term, consider these safeguards:

1. Secure consent from the parent.
2. Meet in a predictable location at a predictable time (same time/place each occurrence).
3. Meet in a publicly visible space.
4. Follow guidelines outlined in this Policy for interaction with youth or vulnerable adult (regarding awareness, screening, interaction, and reporting).
5. Meet in groups of at least three (3) people.

Events with Children, Youth, or Vulnerable Adults

A. Supervisory Plan

The purpose of the supervisory plan for any given activity is to give direction to clergy, employees (of the diocese and each congregation), diocesan leaders, vestry members, Child and Youth Workers, and Workers with Vulnerable Adults, ensuring appropriate measures are in place to meet the diocesan standard for supervision.

1. All Child and Youth Workers and Workers with Vulnerable Adults involved in the activity need to be informed of the contents of the Supervisory Plan.
2. It is recommended that a copy of the Supervisory Plan be provided to leaders (and parents, depending on the activity) and that the plan be posted in a visible location.
3. Onsite Supervisory Plans should include the following:
    a. A description of the nature of the activity
    b. The details of the registration process and registration form
    c. The personnel responsible for running the activity
    d. The physical environment
    e. Bathroom procedures, including showering procedures if applicable
    f. First aid and medication procedures
    g. The process for reporting discipline concerns
    h. The release of participants
4. The following is the recommended ratio of Certified Adults to children (complies with the Commonwealth of Pennsylvania); congregations in other jurisdictions should verify applicable state law:
    a. Infants (0-12 months): 2 adults for up to 8
    b. Young toddlers (1-2 years): 2 adults for up to 10
    c. Older toddlers (2-3 years): 2 adults for up to 12
    d. Preschool (3-5 years): 2 adults for up to 20
    e. School age: 2 adults for up to 30
    f. Mixed age group: ratio for the youngest child in the group
5. Offsite Supervisory Plans should include all of the items listed in the onsite Supervisory Plan, plus the following additions:
    a. Offsite transportation plan
    b. Dining arrangements
    c. Sleeping arrangements

d. Showering procedures

B. Monitoring Procedures

Clergy, employees, vestry members, Child and Youth Workers, and Workers with Vulnerable Adults must be diligent in monitoring and supervising all related activities in all settings, at all times. Monitoring helps detect problems before they turn into incidents of abuse and helps avoid wrongful allegations of abuse where none has occurred. Research confirms that offsite activities increase the risk of abuse. Monitoring procedures must include, but are not limited to, the following:

1. All activities shall be designed to be supervised by two or more Certified Adult leaders.
2. No child or vulnerable adult shall be left unattended in the church or on the property before, during, or following a church activity.
3. Clergy, employees, vestry members, Child and Youth Workers, and Workers with Vulnerable Adults must avoid any unobserved one-on-one meetings or interactions with children or vulnerable adults. In a discipleship or mentoring relationship, the interactions should take place in a public place or where other persons are present.
4. Watching for Policy violations;
5. Inviting parents to visit at any time unannounced;
6. Carefully reviewing new programs and/or significant changes to any existing programs;
7. Keeping interactions with children and vulnerable adults in full view of others at all times;
8. Keeping unused rooms locked whenever possible;
9. Keeping children, youth, and vulnerable adults in supervised areas;
10. A written copy of the Supervisory Plan must be kept onsite (and, if applicable, offsite) for all educational, pastoral, recreational, or other programming that involves children, youth, or vulnerable adults.

C. Restroom Use

Because preschool, nursery, special needs children, and some vulnerable adults may require assistance with their bathroom activities, all clergy, employees, Child and Youth Workers, and Workers with Vulnerable Adults must observe the following policies:

1. Diapering
    a. Only screened and trained nursery workers or the children's parents will undertake the diapering of children of either biological sex. (To build trust and to minimize exposure based on statistical research, congregations may determine that diapering, toilet training, and restroom monitoring will only be done by Certified Adult female staff/volunteers or the children's parents.)

b. Changing of diapers should be done in plain sight of other nursery workers. Children should not be left unattended while being changed.
c. Children should be re-diapered and re-clothed immediately upon the completion of removing their soiled diaper.

2. Toilet training
    a. No child will be forced to toilet train.
    b. Only Certified Adult nursery workers or the children's parents will participate in toilet training efforts with children.
    c. When a child is being assisted in a bathroom, the stall door will be left partially open.
    d. Preschool-age children will never be left unattended in bathrooms.
    e. Children may be assisted in straightening their clothing before returning to the room with other children, if necessary.
    f. Accidents should be handled by reassuring the child and completing the changing of diapers or underwear and clothing.
3. Elementary-age children
    a. Elementary-age children typically will not need supervision in the restroom but may request it.
    b. When providing assistance, Child and Youth Workers should take steps to avoid being alone with one child in the restroom.
    c. If a Child and Youth Worker must go into the restroom to check on an individual child, he or she should seek out another worker to accompany him/her.
    d. If another Child and Youth Worker is not available to accompany, he/she should go to the exterior bathroom door, knock, and ask if the child needs assistance. If the child requires assistance, the Child and Youth Worker should leave the exterior bathroom door open when entering the bathroom area and try to verbally assist the child in completing his/her activities, while the child remains behind the door of the bathroom stall.
    e. Only as a last resort will the Child or Youth Worker assist directly (such as with a child with disabilities).
    f. Triads of the same-age, same-biological-sex buddy system may be used with caution.

D. First Aid and Medication

Ideally, any and all medication should be administered by the child's parent. Medication may be given to a child by a Child and Youth Worker as authorized by the parent.

1. An appropriate permission form for medication must be completed.
2. The medication must be in the original packaging, including over-the-counter medication.

3. When medically necessary, medication or first aid may be administered to a child by a Certified Adult consistent with the Supervisory Plan. Parents should be notified whenever medication or first aid has been administered.

E. Release of Children or Vulnerable Adults

Child and Youth Workers or Workers with Vulnerable Adults are responsible for releasing children or vulnerable adults from their care at the close of services or activities only to parents or other persons designated by parents. An appropriate system will be used to check children in and out, such as security tags. It is presumed that a person who drops off a child or student has authority to pick up the child. In the event that Child and Youth Workers or Workers with Vulnerable Adults are uncertain of the propriety of releasing a child or vulnerable adult, they should immediately contact their supervisor before releasing the child or vulnerable adult.

F. Transportation

Child and Youth Workers or Workers with Vulnerable Adults may from time to time be in a position to provide transportation for children or vulnerable adults. The following guidelines should be observed during the transportation whenever practicable:

1. Clergy, employees, Child and Youth Workers, and Workers with Vulnerable Adults who are responsible for driving minors or vulnerable adults to a sponsored activity should provide to the congregation copies of their valid driver's license, vehicle registration, and proof of insurance.
2. The best practice would be to prepare and secure signatures on a Transportation Agreement.
3. The Child and Youth Worker or Worker with Vulnerable Adults driving the child or vulnerable adult must have undergone an insurance-approved background check (check with your broker), including a DMV record check (this is a small add-on charge), as indicated under the "Screening" section above.
4. Congregations are advised to consult with their insurance provider regarding the minimum age for adult drivers. Under no circumstances should anyone under the age of 18 be allowed to drive children, youth, or vulnerable adults as part of a church-sponsored event.
5. Use of applicable child safety seats that meet federal standards is required. For adults and older children, seatbelts are required.
6. The child or youth should be transported in the back seat of the vehicle.
7. Traveling with minors or vulnerable adults in a vehicle should follow the Two-Adult Rule or Rule of Three at minimum (except in a parent/child or other familial situation).

8. If there is an extenuating circumstance causing only one adult and one child to travel together in an automobile, permission must be obtained by a parent of the child, unless they are close relatives. This permission should be written, should include details regarding when/where, and should be signed by the parent or, if only verbal consent is obtained, documented by the Child and Youth Worker.
9. A child or vulnerable adult may need to be transported immediately by one adult in an emergency. In these cases, the Youth Director or Children's Ministry Director or clergy should be notified immediately.
10. Any cell phone use while driving must be hands free and in compliance with state law.
11. Children, youth, and vulnerable adults should be transported directly to their destination.
12. Unauthorized stops at a non-public place should be avoided.
13. Stops for meals, refueling, and restroom breaks should be done as a group.
14. Those organizing the event should avoid transportation circumstances that leave only one child or vulnerable adult in transport.
15. Adults should avoid physical contact with children or vulnerable adults while in vehicles.
16. No one under age 25 may drive vehicles rented by a congregation unless explicitly allowed by the rental agreement.
17. No drivers under age 25 may drive church-owned vehicles unless explicitly covered by the congregation's auto insurance policy.
18. If a family situation necessitates a special circumstance, the family may sign a waiver stating the deviance from the diocesan or congregation policy; this waiver must note the family's acceptance of responsibility.

G. Overnight Events

Overnight events may include lock-ins, mission trips, retreats, and camps.

1. A Supervisory Plan must be created.
2. Diocesan Camp Directors and congregation Camp Directors (any congregation leader leading overnight events, trips, and/or camps), should complete additional relevant training (such as MinistrySafe's Camp Leadership Training) every two years.
3. The Two-Adult Rule should be followed. If a situation arises where only one adult is present, the Rule of Three must be followed.
4. All leaders and volunteers must be Certified Adults.
5. Overnight sleeping arrangements must be described in writing and approved by the Camp Director prior to the activity.
6. As long as any children are awake for a prolonged period of time, at least two trip leaders should be awake and monitoring children to ensure safe behavior.

7. Leaders should check with parents and use good judgment regarding PG or PG-13 movies. R-rated movies require advance approval from both the Rector and parents. NC-17 movies are not permitted.
8. Appropriately modest sleeping attire must be worn by all attendees (both tops and bottoms).
9. In the event of a sleepover on campus that involves both boys and girls, boys and girls must sleep in separate rooms and must be properly supervised by leaders of the same biological sex.
    a. Leaders will monitor sleeping children by periodically conducting visual bed checks to ensure that sleeping children remain in designated sleeping places.
    b. During bed checks, leaders should never physically touch a child.
10. Whenever possible, leaders will sleep in the same room as the children, or in an adjoining room with the door between the rooms kept open.
11. In the event that overnight arrangements do not include standard beds, each leader and child will use single sleeping bags or blankets. In these instances, bags or blankets must not be shared by more than one person.

H. Off-Campus, Non-Sponsored Youth Activities and Events

Sometimes, Child and Youth Workers or Workers with Vulnerable Adults may organize a social event off-campus that are not sponsored by the congregation and may only be open to certain youth or vulnerable adults.

1. These events should remain in compliance with this Policy and with the individual congregation's policy, specifically with regard to the Two-Adult Rule.
2. The events should also comply with other safety rules to protect the children and vulnerable adults, the congregation, and the leader involved.

I. On-Campus, Non-Sponsored Activities and Events

Church facilities may be used by non-church-sponsored groups for activities and events (such as Young Life, the Boy Scouts, private parties, etc.). These events may choose to offer childcare or youth activities on their own, using church facilities.

1. All congregation's should consult their insurance policy regarding these types of activities and to be compliant with the restrictions and recommendations of that insurance policy.
2. It is recommended that all congregations use a Facilities Agreement that clearly delineates the outside organization's responsibility and liability for their program and leaders.

3. Outside groups should be required to affirm that they follow best practices in safeguarding children and vulnerable adults and to provide and certify adequate insurance coverage (request certificate of insurance).

J. Home Group Procedures

The Diocese and its congregations do not exercise control or responsibility over social gatherings organized by congregation members. The care and protection of children and vulnerable adults in such settings is the responsibility of the parents of each child or vulnerable adult.

With respect to home groups (defined as a small group meeting offsite for discipleship, Bible study, worship, fellowship, etc.) that are sponsored by the Diocese or one of its congregations, where children or vulnerable adults are in attendance, the following rules apply:

1. It is recommended that leaders of home groups organized by congregations read this Policy and take the abuse awareness training provided.
2. If children will be supervised in a separate space or behind closed doors from their parents, it is recommended that the leaders create a Supervisory Plan for their events, to ensure
    a. Any supervision of children should utilize the Two Adult Rule or the Rule of Three
    b. The environment is safe
    c. Restroom procedures are adequate to the environment and needs of the children
    d. Parents are involved when necessary, such as assisting with diapering or restroom use

Reporting

Allegations of misconduct will be taken seriously. Any inappropriate behavior or suspected abuse must be reported immediately. All leaders who learn of misconduct or abuse by clergy or lay leaders have an ethical responsibility to follow up on this information by reporting it to the appropriate ecclesiastical authorities and, when relevant, legal authorities.

A. Examples of Misconduct to be Reported

A clergyperson, employee, or volunteer shall report promptly whenever he/she, any member of his/her household, or anyone attending the congregation

1. is involved in or becomes aware of any sexually-oriented communications involving a child or vulnerable adult,
2. is involved in or becomes aware of any inappropriate behavior involving a child or vulnerable adult by a clergyperson, an employee, or a volunteer,

3. is arrested for, or convicted of, any crime involving child abuse and/or neglect,
4. is accused of child sexual abuse in a civil proceeding,
5. commits an act of child sexual abuse,
6. is involved in or becomes aware of abuse, neglect, exploitation, or abandonment of an at-risk adult, or
7. is diagnosed with any paraphiliac psychological condition, as defined by the American Psychiatric Association, including, but not limited to, pedophilia, voyeurism, or exhibitionism.

Such information is important for enabling congregation leaders to see that appropriate child protection mechanisms are in place in accordance with this Policy.

B. Receiving a Complaint from an Adult

When someone discloses abuse, the primary responsibility of the listener is to enable a safe environment for the person disclosing the information.

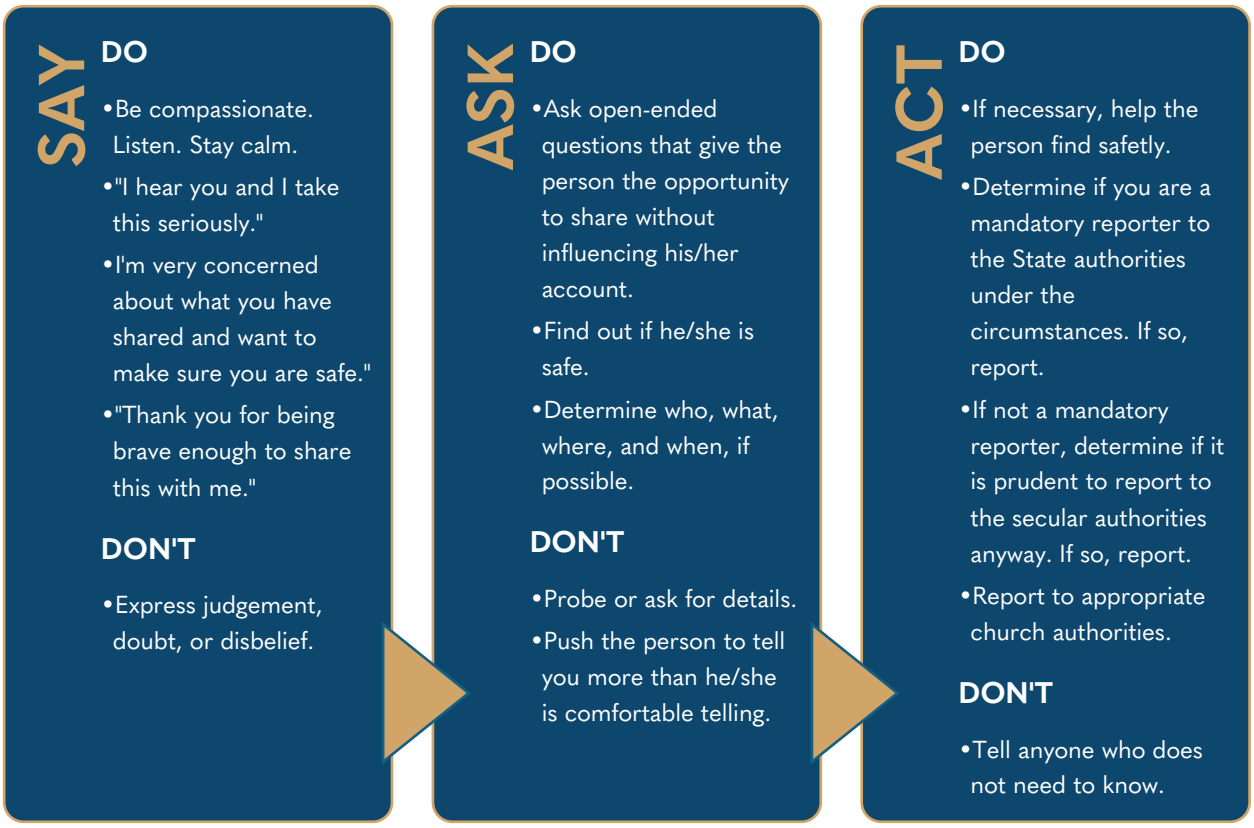
1. If reasonably possible, ask a Certified Adult, or other responsible adult, to join in listening to the account.
2. If someone begins a conversation by implying he/she is about to disclose abuse, and asks you if you can keep it secret, remind him/her that your primary job is to keep him/her and other people safe. For that reason, you cannot promise you will keep it secret.
3. Whenever someone discloses abuse, the following is recommended:
    a. Listen. Do not probe or ask for details. Allow the person to tell you only what he/she is comfortable sharing. Ask open-ended questions like, "Is there anything else you would like to share with me?" If possible, reflect back to the person what you have heard for the sake of clarity.
    b. Avoid expressing doubt or disbelief, judgment of the person, or shock or outrage. Do not assure the person of belief, either. Be calm and compassionate.
    c. Find out if the person is safe and/or has a safe place to go.
4. Some helpful things to say may include the following:
    a. "I hear you and I take this seriously."
    b. "I'm very concerned about what you've shared and want to make sure you are safe."
    c. "Thank you for being brave enough to share this with me."
5. Reassure the person that you will hold their story in confidence insofar as you are able, letting them know that you may, legally or otherwise, be required to report what has been disclosed.

6. After the conversation, immediately take down notes of the conversation. Keep these notes in a safe and secure location to preserve confidentiality.

See the chart below on responding to abuse.

Someone just disclosed abuse to me.

HOW SHOULD I RESPOND?


SAY
DO
•Be compassionate. Listen. Stay calm.
•"I hear you and I take this seriously."
•I'm very concerned about what you have shared and want to make sure you are safe."
•"Thank you for being brave enough to share this with me."
DON'T
•Express judgement, doubt, or disbelief.
ASK
DO
•Ask open-ended questions that give the person the opportunity to share without influencing his/her account.
•Find out if he/she is safe.
•Determine who, what, where, and when, if possible.
DON'T
•Probe or ask for details.
•Push the person to tell you more than he/she is comfortable telling.
ACT
DO
•If necessary, help the person find safetly.
•Determine if you are a mandatory reporter to the State authorities under the circumstances. If so, report.
•If not a mandatory reporter, determine if it is prudent to report to the secular authorities anyway. If so, report.
•Report to appropriate church authorities.
DON'T
•Tell anyone who does not need to know.

C. Receiving a Complaint from a Child or Vulnerable Adult

One of several ways in which the clergyperson, employee, or volunteer may come to suspect abuse or neglect is from information that a child or vulnerable adult him/herself shares. If a child or vulnerable adult discloses abuse or neglect, the clergyperson, employee, or volunteer receiving such a communication should act as follows.

1. Conduct a discussion.
    a. Respect the their privacy by finding an appropriate non-threatening place to talk.
    b. If reasonably possible, ask a staff member, trained volunteer, or other responsible adult to join in listening to the child, youth, or vulnerable adult's account.

c. Be calm and compassionate. Avoid expressing doubt or disbelief, judgment of the person, shock, or outrage.
d. Assure the child or vulnerable adult that any abuse was not his/her fault.
e. If helpful, tell the child or vulnerable adult that he/she was brave to disclose the abuse.
f. Children or vulnerable adults disclosing abuse are often vague in their initial disclosure, so avoid questions that could make them feel responsible or plant ideas that could taint their recollection and account. A safe question may be, "Is there anything else you'd like to tell me?"
g. Gather only the minimum information needed to report. Do not interview the Complainant or try to gather all the details. You may do harm to the Complainant if you do.

2. Write down as accurately as possible what the Complainant disclosed. This information can be used in filing a report of suspected abuse and helps capture the information needed to make a Child Protective Services report. Child Protective Services can follow up by gathering more details with a professional child forensic interview.
3. Be careful afterwards not to discuss the information with, or in front of, other people who do not need to know what happened. Discussion about the information should be limited to appropriate congregation and legal authorities.

D. Initial Report to Diocesan Reports Receiver

Minor conflict should be handled within the congregation. Determine if you need to report the allegation. If the Complainant is a child or vulnerable adult, the best practice would be to report the allegation. The initial report should be made to a Diocesan Reports Receiver.

1. Reporting is time sensitive and may not be covered by insurance if not completed within 24 hours.
2. Reporting to the Diocesan Reports Receivers can be made through a hotline phone call - (412) 945-7024, email – reportsreceiver@adpgh.org, or an intake form on the Diocese's website https://www.adpgh.org/protecting-our-people/.
3. The Diocesan Reports Receivers must ensure that any mandated reporting happens promptly.
4. Any clergyperson or lay leader receiving a report of abuse under this Policy must notify a Diocesan Reports Receiver.

E. Mandated Reporting

When there is a reasonable suspicion that a child or vulnerable adult has been abused, abandoned, neglected, or exploited in violation of the law, the person receiving the complaint (the reporter) must report the abuse, usually working with the Diocesan Reports Receiver. The reporter does not have to verify or investigate the information.

1. To report abuse, the reporter must immediately contact the appropriate state abuse hotline:
    a. Pennsylvania
        i. Child Abuse Reporting - Childline 800-932-0313
        ii. Adult Abuse Reporting – Elder Abuse Hotline 800-490-8505
    b. Illinois
        i. Child Abuse Reporting - DCFS Hotline 800-252-2873
        ii. Adult Abuse Reporting - Adult Protective Services Hotline 866-800-1409
    c. Minnesota –
        i. Child Abuse Reporting - DHS Central Intake line 651-431-6600
        ii. Adult Abuse Reporting - MAARC 844-880-1574
    d. Tennessee
        i. Child Abuse Reporting - 877-237-0004
        ii. Adult Abuse Reporting - 888-277-8366
2. All reports are confidential and access to these reports is limited by specific criteria described in the appropriate state's statute(s).
3. The Diocesan Reports Receiver can assist with abuse reporting.
4. The Diocesan Reports Receiver will ensure that any reasonable suspicions of abuse of a child or vulnerable adult are immediately reported to the appropriate authorities, whether the abuse has been verified or not.
5. The Diocesan Reports Receiver may consult with the Chancellor for assistance in identifying and complying with the appropriate abuse reporting requirements within the timeframe required. Permissive reports are encouraged even where not required when there is a reasonable suspicion of abuse of children or vulnerable adults.
6. Generally, persons reporting abuse to Child Protective Services are not required to give their names and/or may request confidentiality.
7. Please refer to the relevant reporting form.

F. Allegations Against Lay Leaders

1. The Diocesan Reports Receiver notifies the Rector, Senior Warden, and Safe Church Director. This allows them to put in place a response plan and if needed, a safety plan.

2. The Diocesan Reports Receiver will also notify the Bishop, Chancellor, and Chair of the Standing Committee.

G. Allegations Against Clergy

1. The Diocesan Reports Receiver will notify the Bishop, Chancellor, and Chair of the Standing Committee.
2. The Diocesan Reports Receiver will also notify the Rector or appropriate clergy at the congregation level.
3. The Diocesan Reports Receiver will evaluate the report in a timely manner and recommend to the Bishop whether the report discloses reasonable grounds to believe an offense has been committed under Title IV of the ACNA C&C, entitled "Ecclesiastical Discipline," as the same may be amended.
4. With the advice of the Standing Committee (or its designated subcommittee), the Bishop shall determine whether a report of misconduct should move to an investigation stage.

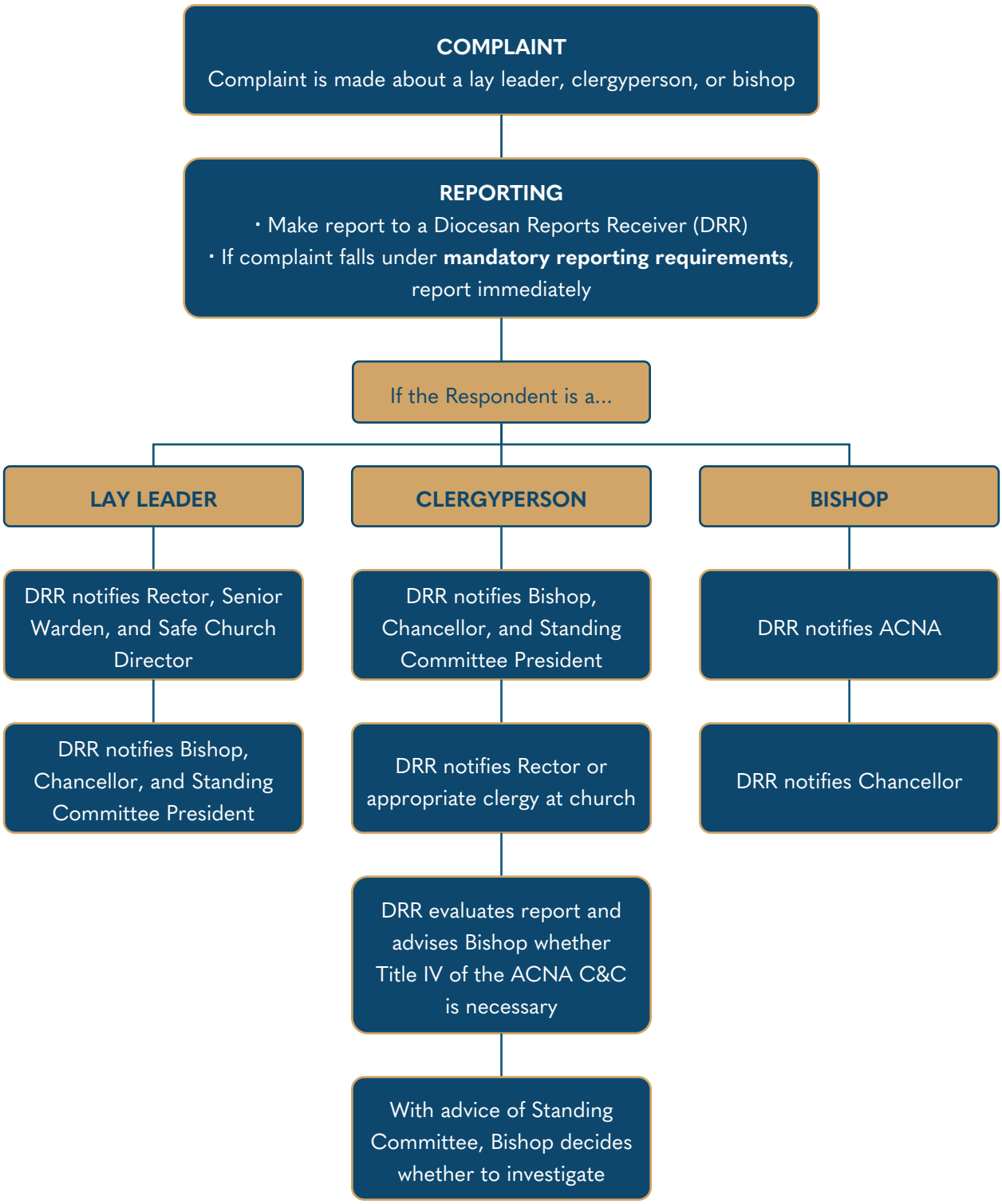
H. Allegations Against the Bishop

1. If the Diocesan Reports Receiver receives a report that the Bishop has engaged in misconduct, he/she will notify the Province in writing at misconduct@acna.org.
2. The Diocesan Reports Receiver will also notify the Chancellor.
3. Any other person believing that the Bishop has engaged in any misconduct/abuse should immediately notify the Province in writing at misconduct@acna.org.

Complaint Response Process

Minor conflict should be handled within the congregation. For potential issues of abuse or misconduct, the following reporting procedures are recommended.

COMPLAINT RESPONSE PROCESS


COMPLAINT
Complaint is made about a lay leader, clergyperson, or bishop
REPORTING
· Make report to a Diocesan Reports Receiver (DRR)
· If complaint falls under mandatory reporting requirements, report immediately
If the Respondent is a...
LAY LEADER
CLERGYPERSON
BISHOP
DRR notifies Rector, Senior Warden, and Safe Church Director
DRR notifies Bishop, Chancellor, and Standing Committee President
DRR notifies Bishop, Chancellor, and Standing Committee President
DRR notifies Rector or appropriate clergy at church
DRR evaluates report and advises Bishop whether Title IV of the ACNA C&C is necessary
With advice of Standing Committee, Bishop decides whether to investigate
DRR notifies ACNA
DRR notifies Chancellor

Responses

The Rector holds pastoral and disciplinary responsibilities regarding allegations against a lay person or lay leader and has responsibility to direct appropriate responses. The Bishop holds pastoral and disciplinary responsibilities regarding allegations against clergy and has responsibility to direct appropriate responses. In the case of an allegation against a bishop, the Province will direct appropriate responses.

A. Initial Responses

1. In cooperation with the Diocesan Reports Investigation Committee, the Bishop/Rector will direct a safety plan to keep all persons safe. This may include placing persons on administrative leave, as described below.
2. In cooperation with the Diocesan Reports Investigation Committee, the Bishop/Rector will design a response plan, which will address care for stakeholders, due process, and confidentiality.
3. Each congregation is expected to have in place a plan (even if only a brief overview) to use when responding to any allegation of child abuse. That plan may include a response team of individuals instructed with proper response mechanisms, along with additional procedures to implement throughout the congregation in responding to the allegation.
4. If a person accused of abuse is not the child's parent of a child or vulnerable adult or otherwise a member of the same household, the Bishop or Rector (as appropriate) or designee should contact the parents and offer support from the congregation.
5. In most circumstances, the Diocesan Reports Receiver or Rector should notify the Chancellor and/or the congregation's legal counsel. Obtaining competent legal advice at the very outset of the matter will help protect the Diocese/congregation from failing to comply with legal duties and/or being exposed to additional legal liability.
6. Normally, the Bishop/Rector, in consultation with the Director of Administration, will notify the appropriate insurance carrier.
    a. The insurance policy may require immediate notification for coverage to be effective.
    b. The policy may pay for counseling or legal advice.
    c. The policy may not provide coverage for lawsuits involving acts of sexual abuse.
    d. The insurance carrier, having dealt with similar cases, may be a source of helpful advice.
7. Response plans, whether from the Diocese or the congregation, must address pastoral care.
    a. Pastoral care will be offered to the Complainant and family members as needed.

b. Pastoral care will be offered to the Respondent.
c. Pastoral care will be considered for congregation members and other stakeholders.
d. Pastoral care must not be provided directly by the Bishop/Rector, or any decision-makers, but instead by Advocates, Chaplains, and/or consultants in order to avoid compromising the response.

8. The Complainant should be advised that appropriate steps are being taken to consider and address their complaint.
9. The Respondent should be provided due process and recognition that allegations may not be true.
10. Any bishop or priest not involved in the process may, at any time following the first receipt of the complaint, hear the sacramental confession of any person(s) involved.

B. Administrative Leave

1. Depending on the nature of the allegations, it may be appropriate to immediately suspend employment or volunteer activities. This is essential where there are safety issues. Normally, this is done quietly and confidentially. Suspension may also be limited as appropriate. Some possibilities are as follows:
    a. an interim transfer to a position that has no contact with children or vulnerable adults
    b. a leave of absence (usually with pay for an employee)
    c. performing duties remotely
2. The alleged offender's church-related employment or volunteer activity may be suspended by the Rector or other person in charge of a congregation after consultation with the Bishop (for lay people), or inhibited by the Bishop under the Constitution and Canons of the Diocese and the ACNA (for clergy), until such time as the allegations of misconduct or abuse are resolved.
3. This leave of absence is without prejudice (i.e., it does not imply guilt or innocence of the person under investigation). Payment of salary and benefits to the employee may be discontinued only after consultation with the Bishop.

C. Investigative Response

1. In cooperation with the Diocesan Reports Investigation Committee, the Bishop (for clergy) or Rector (for lay persons) will determine if an investigation is needed.
2. It is also the responsibility of the clergy, diocesan leadership, vestry members, congregation members, and volunteers to cooperate with both governmental and in-house investigations, guided by legal counsel.

a. A failure to do so may be a cause for termination.
b. Ecclesiastical investigations must be coordinated so that they do not interfere with governmental investigations.

D. Further Investigative Response for Clergy

1. When a clergy member is accused, the Diocesan Reports Investigation Committee will investigate the complaint and provide a written report to the Bishop, Chancellor, and Chair of the Standing Committee.
2. Prior to a decision, all parties involved may be given an opportunity to provide information regarding the allegations (including without limitation the Complainant, parents, and/or the Respondent), at the discretion of the investigator(s). This invitation may be declined.
3. The Bishop may appoint an Advocate for Complainants.
4. Upon completion of the inquiry into accused clergy, the Bishop shall take whatever actions he, the Chancellor, and the President of the Standing Committee deem appropriate, including removal, mediation, reconciliation, and/or the use of a Godly Admonition.
5. If enough evidence is found that a canonical offense has been committed, a third-party investigation may be warranted. If the investigation is conducted by legal counsel, the information gathered and conveyed to the attorney may be privileged from disclosure as a confidential attorney-client communication or attorney work product under certain state laws.
6. Canonical procedures will be employed according to the ADP C&C and the ACNA C&C.
7. Through the investigative stage, the Diocese shall facilitate the provision of pastoral care for the Complainant, as well as for clergy who are subject of such complaints.

E. Documentation

1. Documenting responses to complaints is critical.
2. Documentation of complaints and investigations should be saved in confidential files with controlled access.
3. Clergy or their designees should document any actions taken regarding the complaint. (The congregation's legal counsel may have specific instructions for how such documentation should be prepared and maintained.)
4. While investigation of suspected child abuse is the legal responsibility of the police or child protective authorities, at times the congregation may need to follow up with its own investigation as set forth herein.

5. While the investigation of suspected abuse of vulnerable adults is the legal responsibility of the police or other legal authorities, at times the congregation may need to follow up with its own investigation as set forth herein.

F. *Release of Information*

1. A point person will respond to all inquiries (media or otherwise).
    a. For the Diocese, this point person is usually the Bishop or, at his/her discretion, a member of the Diocesan Reports Investigation Committee, a member of the Diocesan Council, or another qualified person.
    b. For a congregation, the point person is usually the Rector or, at his/her discretion, the Safe Church Director, a member of vestry, a member of the Safe Church Committee (if applicable), or another qualified person.
2. The point person will use a prepared statement to answer any media inquiries and to convey information regarding the incident to members of the congregation.
    a. Such a statement should be reviewed by the congregation's legal counsel and must be approved by the Bishop.
    b. Do not release any information until authorized.
3. To the extent possible based on the circumstances, safeguard the privacy and confidentiality of those involved by not releasing names or other identifying information, especially of any minors.
4. Maintain confidentiality to the extent possible in order to protect the privacy and reputations of those actually or allegedly involved in the incident, to reduce the risk that defamation may occur and to help preserve attorney-client privilege, where otherwise applicable.

G. *Disciplinary Action*

1. Discipline or dismissal may be appropriate if a Respondent is convicted or if there is a finding in an investigation. The Bishop and Chancellor may give guidance on what is appropriate. In addition to possible dismissal, discipline may also include Godly Admonitions, counseling, or other approaches.
2. Where charges are unsubstantiated, the decision about whether to restore the person may depend on a number of factors, including a safety plan and the person's attitude.
3. Personnel actions should be well documented and stored confidentially.

Policy Creation and Maintenance

The Bishop and the Diocesan Council are responsible for the creation and promulgation of this Policy, in accordance with the ADP C&C.

A. Division of Responsibilities

The Diocesan Council will, at least every two years, review and consider whether any revisions to the Policy are necessary and advisable in light of practical experiences, medical and other scholarly research, legal developments, and other relevant considerations.

The Rector has overall responsibility for the compliance and administration of this Policy within the congregation he/she leads and for providing all reports requested by the Diocese.

B. Basic Procedures

The Diocese requires that, at a minimum, each congregation is expected to have in place these four (4) procedures with regard to the protection of children and vulnerable adults as described in this policy:

1. Procedure 1: Awareness
2. Procedure 2: Behavioral Expectations
3. Procedure 3: Reporting
4. Procedure 4: Compliance

Policy Oversight

A. The Diocesan Office

The diocesan office is responsible for

1. upholding the ACNA C&C and maintaining/upholding the ADP C&C,
2. setting additional, clear diocesan policies and procedures,
3. following through on those policies and procedures to provide a consistent and transparent process, and
4. reporting to relevant law enforcement authorities in conformity with applicable law when necessary.

B. Clergy Responsibilities

Clergy are responsible for

1. knowing and abiding by the diocesan policies and procedures,

2. ensuring that timely training and resulting written acknowledgements occurs for all parties identified within this Policy who are under their supervision,
3. reporting to the Diocesan Reports Receiver any allegation of misconduct/abuse,
4. reporting to relevant law enforcement authorities in conformity with applicable law when necessary, and
5. providing proof of compliance of all such policies and procedures to the diocesan office upon request.

C. Rectors and Wardens

Rectors and Wardens are responsible for

1. maintaining record keeping of all procedures outlined in this document,
2. upholding the policies set forth in this document, which represent an appropriate standard of care, and adopting them as their own,
3. reconciling this Policy with the conditions of their particular congregation's insurance coverage and the need for a contextualized policy, ensuring that the conditions for their insurance coverage are met,
4. reviewing their insurance policy and calling the Director of Administration if they have any questions, and
5. providing proof of compliance of all such policies and procedures to the Director of Administration upon request.

The Diocese assumes no responsibility for a congregation's non-compliance with its insurance carrier's policy.

D. Employees, Vestry Members, Child and Youth Workers, and Workers with Vulnerable Adults

Employees (of the diocese and each congregation), diocesan leadership, vestry members, Child and Youth Workers, and Workers with Vulnerable Adults are responsible for

1. abiding by this Policy,
2. reporting to the Diocesan Reports Receiver any allegations of misconduct or abuse, and
3. reporting to relevant law enforcement authorities in conformity with applicable law when necessary.

E. Insurance Concerns

Insurance companies often have particular requirements.

1. In most cases, insurance companies require notice and responsive action within a specific timeframe, or the institution forfeits coverage.
2. A congregation's adoption of written standards of conduct may be required by insurers as a condition of coverage.
3. Failure to comply with policy standards could result in denial of insurance coverage in the event of a claim.

Compliance

A. Congregations

Congregations have particular responsibility separate from the Diocese.

1. Congregations are responsible for securing and tracking the screening and training requirements, and compliance thereof, for all non-clergy Certified Adults, Child and Youth Workers, and Workers with Vulnerable Adults in their congregation.
2. The Diocese assumes no responsibility for a congregation's non-compliance with their insurance carrier's requirements or any additional insurance carrier screening or training requirements.
3. All congregations and mission fellowships associated with the Diocese will update their rosters of clergy, employees, vestry members, Child and Youth Workers, and Workers with Vulnerable Adults by December 31 of each year. Compliance documentation is due to the Director of Administration by September 1 of the following year in conjunction with the annual congregational audit.
4. In the event of any modifications to this Policy, revised versions of this Policy will be distributed to each congregation, with information regarding the timeframe by which any such changes must be implemented so as to come into compliance therewith.
5. It will be the responsibility of the Rector of each congregation to ensure all clergy, employees, vestry members, Child and Youth Workers, and Workers with Vulnerable Adults are made aware of the congregation's policies and that all those who are required to complete training hereunder do so in a timely fashion.

B. The Diocese

1. The diocesan office is responsible for tracking the screening and training of clergy, diocesan employees, diocesan leadership, diocesan Child and Youth Workers, and diocesan Workers with Vulnerable Adults.

2. Anyone involved in a diocesan program is expected to sign an individual policy acknowledgement every two years. This includes all diocesan clergy and employees, Child and Youth Workers, and Workers with Vulnerable Adults.